

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
)	
v.)	Criminal No. 21-10104-PBS
)	
VLADISLAV KLYUSHIN,)	
a/k/a "Vladislav Kliushin,")	
Defendant.)	

UNITED STATES' MOTION FOR LEAVE TO FILE A REPLY BRIEF
(Assented-To)

Pursuant to Local Rule 7.1(b)(3), the United States of America, by its attorney, Joshua S. Levy, Acting United States Attorney for the District of Massachusetts, respectfully requests leave to file a reply brief in support of its pending Motion for the issuance of a Preliminary Order of Forfeiture for Substitute Assets in Partial Satisfaction of Order of Forfeiture (Money Judgment) and Restraining Order (Docket No. 269). A proposed reply brief is attached hereto at Exhibit 1.

As grounds for this motion, the United States wishes to respond to certain statements made in defendant Vladislav Klyushin's (the "Defendant") Response, Docket No. 271, regarding ownership of the property, effect of the applicable Mutual Legal Assistance Treaty, and pending appeal.

Pursuant to Local Rule 7.1(a)(2), the undersigned Assistant United States Attorney conferred with counsel for Defendant on February 6, 2024, by email, who assented to this request.

WHEREFORE, the United States respectfully requests permission to file a reply.

Respectfully submitted,

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Acting United States Attorney,

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